

## Novel coronavirus (COVID-19) “Consequences” inspection campaign – Exit Brief

<b>Duty-holder:</b>	Jadestone Energy (Australia) Pty Ltd  Jadestone Energy (Eagle) Pty Ltd	<b>Date:</b>	21 April 2020  Skype meeting   24 April 2020  Exit Brief issued	<b>Interviewee(s):</b>	Owen Hobbs  Tom Coolican  Helen Astill  Leisa Maguire  Luke Mioceovich  Andrew Gibbons	<b>NOPSEMA Inspectors:</b>	Georgia Derham  Stuart Allison
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NOPSEMA intends to collect regulatory information via a targeted series of inspections across the industry, with the aim of gaining situational awareness intelligence around how the industry is managing consequences of the COVID-19 pandemic. NOPSEMA’s intelligence around industry’s management of COVID-19 consequences will inform an industry wide view of the situation and allow NOPSEMA to identify and plan our regulatory priorities in an informed way. It will also allow NOPSEMA to review and understand the changes occurring as the situations develops. *Note: this Prompt Sheet is subject to review and change without notice.*

### Topic 1 – Operational status of facilities and activities

The following information aims to provide NOPSEMA with situational awareness regarding the current operational status of facilities and activities so that it is better placed to target regulatory services.

Topic summary	Prompt	Operator Response	NOPSEMA Observations
Operational status of <u>petroleum production operation</u> facilities	1. Please describe the operational status of all <u>petroleum production operation</u> facilities?	Petroleum production operations managed by Jadestone Energy include Stag (WA-15-L) and Montara (AC/L7, AC/L8) facilities.  Facilities in both locations are operational and producing.	Operator response noted.  Both Stag and Montara operating at steady state.
	2. Please describe any planned changes/challenges to this status in response to the COVID-19 pandemic?	Non-essential activities and work fronts have been deferred, however planned maintenance and operational activities as scheduled.  Challenges experienced to date are primarily attributable to changes made to: <ul style="list-style-type: none"> <li>logistics</li> <li>personnel mobilisation/ demobilisation to/from facilities</li> <li>personnel rosters, in response to government border closures and quarantine requirements of individuals</li> </ul> (see more information in item #3).	Operator response noted.  No foreseeable requirement to reduce or stop production.
	3. Please describe any changes/challenges to manning and rostering in response to the COVID-19 pandemic?	Rosters for the facilities have been modified as follows: <ul style="list-style-type: none"> <li>Stag – normal roster accommodates swings of 2 on/2 off/2 on/4 off (weeks), modified roster is 2 quarantine/ 4 on/ 6 off</li> <li>Montara – normal roster accommodates swings of 3 on/3 off/3 on/6 off (weeks), modified roster is 2 quarantine/ 4 on/ 6 off</li> </ul> In addition, reduction to minimum manning levels as provided by the respective Safety Cases have been reached to allow accommodation of personnel as one person per room/cabin.	Operator response noted.  Rostering arrangements were conducted with consultation with members of the workforce.  A three crew rotation, provides some element of redundancy if a complete change out was required.

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	4. Please describe any changes to the transport of personnel to and from facilities as a result of COVID-19. What protocols are in place with respect to PPE and any other COVID-19 precautions?	<p>Personnel movements to/from Stag continue to follow the same mobilisation/demobilisation route: Perth &gt; Karratha &gt; Stag (return).</p> <p>For Perth based personnel, a two-week quarantine period at home is required prior to mobilisation, while for interstate personnel, a two-week quarantine period at COVID-19 accredited accommodation is required prior to mobilisation.</p> <p>Personnel movements to/from Montara have a modified mobilisation route: Perth &gt; Broome &gt; Truscott airbase &gt; Montara Venture (return).</p> <p>For Perth based personnel, a two-week quarantine period at home is required prior to mobilisation, while for interstate personnel, a two-week quarantine period at COVID-19 accredited accommodation is required prior to mobilisation.</p>	<p>Operator response noted.</p> <p>Travel arrangements were conducted with consultation with members of the workforce.</p> <p>No PoB changes have been made to routine helicopter flights.</p> <p>No additional PPE is required for routine helicopter flights. However, additional helicopter cleaning sanitation steps have put in place by helicopter operators, particularly for lifejackets in between flights.</p> <p>Questions were raised regarding the transport of the offtake tanker ‘loading / mooring’ masters / pilot for offtakes. The operator explained these are conducted from OSV’s and the loading / mooring masters / pilot do not board or disembark the offtakes from the Stag or Montara facilities.</p>
	5. Does your company have a process in place to allow for “exempted person” status to cross state or federal borders, and to allow intrastate travel within WA (if required)	<p>Jadestone’s processes reflect wherever possible those requirements as stipulated by the relevant Government jurisdiction, in this case Western Australia.</p> <p>WA has an exemption process for travellers, including personnel returning from Commonwealth based facilities and for specialist skills not in WA: <a href="#">WA Entry – Request for Approval as an Exempt Traveller</a></p>	<p>Operator response noted.</p> <p>If a travel exemption is required for international or out-of-state workers, the state/national requirements for quarantine are followed. If exposure of a traveller to an infected person is identified, or if symptoms are present (e.g. runny nose, temperature), a risk assessment with the Company Physician is conducted.</p> <p>Jadestone has engaged <i>Health, innovation and performance</i> to develop a mental health framework to implement for next shift coming over for quarantine.</p> <p>Mental health framework managed by health professionals – provision of an information sheet on how to self-manage during quarantine including issues to expect, how to cope and self-awareness of stress symptoms. Monitoring of mental wellbeing involves initial contact and then check ins during quarantine period, as well as support that is considered required, or is requested, during the offshore swing. Also, formal fitness for work assessment for mental wellbeing done prior to mobilisation by health professionals.</p>
	6. Please describe the impact on planned inspection, maintenance and repair of <b>safety critical equipment</b> at your facilities. How are these planned activities being prioritized? How is (any) backlog being tracked and managed?	<p>Non-essential activities and work fronts have been deferred, however planned maintenance and operational activities as scheduled.</p> <p>Maintenance, including any backlog, is being tracked through Jadestone’s computerised maintenance management system Bassnet.</p>	<p>Operator response noted.</p> <p>Currently no deferred safety critical (SCE) maintenance.</p> <p>Both facilities have existing systems in place for management of deferred maintenance. This process includes a risk assessment.</p> <p>Operator reviews maintenance against several criteria, including as example:</p> <ul style="list-style-type: none"> <li>Whether contractor performed maintenance be conducted by core crew.</li> </ul>

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			<ul style="list-style-type: none"> <li>Within the 120 day maintenance planning process, deferrals are reviewed through normal process.</li> <li>Current MOC process considers all safety critical maintenance.</li> </ul> <p>Operator gave example of non-essential maintenance – e.g. mess floor covering on Stag as not safety critical. However, could still present a (trip) hazard.</p>
	<p>New question</p> <p>7. Please describe the impact on planned inspection, maintenance and repair of <b>production critical equipment</b> at your facilities. How are these planned activities being prioritized? How is (any) backlog being tracked and managed?</p>		The Montara and Stag facilities do not supply energy to the domestic market.
	8. How is the COVID-19 situation affecting planned shutdown and fabric maintenance campaigns?	<p>There is a minor shutdown planned for Montara late June.</p> <p>There are no shutdowns planned for Stag in the remainder for 2020.</p> <p>Fabric maintenance campaigns will continue as planned.</p>	<p>Operator response noted.</p> <p>Montara planned 4 day shutdown scheduled last week in June 2020.</p> <p>Scope includes communication link rectifications and maintenance on safety systems.</p> <p>POB to increase from 26 to 41.</p> <p>All personnel will be accommodated in a single cabin.</p>
Status for continuation or commencement of all other activities (e.g. drilling, construction, seismic)	<p>9. What is the current status of any <u>drilling</u> activities <i>currently underway</i>?</p> <p>If you have any drilling activities underway, what do you intend to do over the following planning horizons:</p> <ul style="list-style-type: none"> <li>Next 28 days? and</li> <li>Next 3-months?</li> </ul>	There are no drilling activities currently underway.	Operator response noted.
	10. Do you still plan to commence any <u>planned drilling</u> activities in the next 3 months that have <i>not yet commenced</i> ?	Planned drilling for Montara was due to commence in June 2020 and has been deferred, due to rig availability.	Operator response noted and operator advised deferral due to rig availability and unknown when will commence.
	<p>11. What is the current status of any other activities with an associated standalone permissioning document (e.g. <u>seismic survey, installation or construction</u> activities) <i>currently underway</i>?</p> <p>In relation to any of these activities currently underway, what does your company intend to do over the following planning horizons:</p> <ul style="list-style-type: none"> <li>Next 28 days? and</li> </ul> <p>Next 3-months?</p>	11.Jadestone has no planned activities in 2020 that require standalone permissioning documentation.	Operator response noted.

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	12. Do you still plan to commence any of these other planned activities with an associated stand-alone permissioning documents in the next 3 months that has <i>not yet commenced</i> ? If yes, please provide details of each case	12. Not relevant	Operator response noted.

### Topic 2 – Understanding safety, integrity and environmental management risk gaps

The following information aims to provide NOPSEMA with situational awareness regarding changes in operational risk profiles due to operational responses to the pandemic.

Topic summary	Prompt	Operator Response	NOPSEMA Observations
Identifying and managing change in impact/risk profile to ensure continued safe and environmentally-responsible planned activities	1. Has there been a review of the safety, well integrity and environmental risk profile of your planned activity/ies in the wake of the COVID-19 outbreak?  If no, when is this scheduled to be undertaken?	Yes – management of change process and associated documentation has been prepared and implemented (MOC 2020-054)	Operator response noted.  Operator advised that MOC 7 safety critical systems and diff aspects of workforce were consulted (company physician, OIM etc). Workforce consulted around shifts.
	2. Have there been any changes to the safety, well integrity and environmental impacts and risks? If yes, <ul style="list-style-type: none"> <li>what are the nature of these changes?</li> <li>How are such changes being managed within your organisation?</li> <li>What are the activities and/or impact/risk control measures that have been reviewed in relation to changes to safety, integrity and environmental impacts and risks?</li> </ul>	A risk analysis of the changes generated with management of the COVID-19 pandemic at Jadestone’s offshore operations has been included in MOC 2020-054. Changes include: <ul style="list-style-type: none"> <li>- Modification to offshore rosters to incorporate a 14-day pre-mobilisation quarantine period as well as addressing fatigue management and safety critical roles/ skills requirements</li> <li>- Development and implementation of procedures that ensure operations align with state/ national emergency management requirements</li> <li>- Meeting competency and training refresher requirements during a time when face to face assessments are in general not available</li> </ul> <p>These changes are being managed through the Change Management process and workforce consultation completed by workshop, information mail outs, COVID19 intranet page, HR confidential Q&amp;A process.</p>	Operator response noted.  Operator advised standard risk assessment process followed as described in SMS, either change management or deviation process.  Changes considered competencies and were communications where workforce is affected.  Ran though Jadestone MOC process and not many gaps identified.
Identifying and managing change in impact/risk profile associated with maintaining	3. Has your organisation undertaken a review to identify risk gaps, associated with the COVID-19 pandemic, that may affect your : a. control measures associated with an MAE? b. ability to access source control?	Responses: a. MOC 2020-054 assesses integrity of each safety critical management system applicable to the two operations b. Refer exemption process under Topic 2, item #5	Operator response noted.

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preparedness for an unplanned event	c. oil spill response and oil spill monitoring capability?	Jadestone is liaising with APPEA and AMOSC, and aligns with, the proposed measures for ensuring preparedness requirements for spill response strategies are maintained.	
	<p>4. Has your organisation’s risk gap (or ALARP position) changed due to circumstances associated with COVID-19? i.e. is your response capability reduced?</p> <p>In particular, please explain with reference to any consideration given to:</p> <ul style="list-style-type: none"> <li>• medical evacuation (medevac) arrangements.</li> <li>• organisational reliance on international resources (people and equipment) needed to respond to an oil pollution emergency.</li> <li>• If yes, how is this change being managed?</li> </ul>	<p><u>Medevac</u></p> <p>Medevac arrangements remain as per procedures. Medevac logistics are determined on a case by case basis to ensure the IP is attended by the correct medical expertise and facilities.</p> <p><u>Oil Spill Response</u></p> <p>Jadestone is a member of APPEA and AMOSC. As such, Jadestone has received and is aligned with the protocols required by the Upstream Industry COVID19 OSR Disease Management Plan distributed by APPEA on behalf of industry members on 7 April 2020.</p> <p>That is, Jadestone can either seek an exemption for response personnel from State and/or National governments in the event of a spill requiring interstate and/ or international personnel, or coordinate resources such that the 14-day quarantine period requirement is met.</p>	<p>Operator response noted.</p> <p>Operator advised the only risk gap in existing systems is in mental health.</p> <p>Operator confirmed that engaged member of APPEA and Owen Hobbs is involved in all communications, working with Andrew Taylor from APPEA and template uses Jadestone template plan.</p> <p>APPEA sub working group for oil spill response to confirm rigs.</p> <p>Tom Coolican is part of working safely together group.</p> <p>Weekly dial-in with APPEA.</p> <p>As a member access the MOU that in event of loss of well control have access to rigs, with not drilling this year likely so not actively tracking.</p> <p>Jadestone has an internal COVID-19 management project group.</p>
	<p>5. Do you have suitable arrangements in place to achieve source control, in a timely fashion, in the case of a well blow-out?</p> <p>If yes, what are the key features of these arrangements?</p>	<p>A loss of well control scenario resulting in a tier 2/3 oil spill at Stag requiring interstate/international crew or asset(s) is not a credible scenario. Therefore, the pandemic is not an impediment to spill response plans for Stag.</p> <p>At Montara, source control for a well blow out requires a relief well drilled by a MODU. Mobilisation times for a MODU arriving at the Montara location to drill a relief well are assumed to be between 18 and 23 days depending on the origin of the MODU. Starting crew would mobilise with the MODU from point of origin and then management of crew change out would apply the exemption and/or 14-day quarantine period for the duration of the drilling period.</p>	<p>Operator response noted.</p> <p>Operator advised that no further arrangements to achieve well kill timeframe commitments. The estimated time to drill is still adequate time to do this. Nature of well not free flowing.</p> <p>No changes to shifts, part of working group.</p>
	6. Has your organisation undertaken a review of the Emergency Response Plan to ensure that you can maintain your emergency response capability throughout the COVID-19 crisis? Please describe any additional measures (if any) you have put in place to maintain emergency response capability.	Capability requirements of the ERPs for Montara and Stag will continue to be met with the core crew rostering, and monitoring of training and competency requirements through Jadestone’s Competency & Learning Management System (CALMS). No additional measures are required to maintain emergency response capability at this time.	Operator response noted.

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### Topic 3 – Strategic coordination of organisational response/management of COVID-19 preparedness and consequences

The following information aims to provide NOPSEMA with situational awareness regarding the strategies organisations are employing to ensure strategic oversight and coordination of responses.

Topic summary	Prompts	Operator Response	NOPSEMA Observation
Establishment of Incident, Crisis or Emergency Management team to coordinate your organisation’s management of COVID19 preparedness and consequences.	<p>1. Has your organisation activated an incident, crisis, or emergency management team to coordinate your company’s response and management of COVID-19 consequences on your business operations?</p> <p>If yes, provide details of the person in charge (e.g. CMT Chief, incident controller) and an organisational chart for the team(s) with names of personnel assigned to key functional roles.</p>	<p>Jadestone has established a COVID-19 Project Team. Project Lead is Owen Hobbs, Country Manager.</p> <p>Reporting to Owen within the team are:</p> <p>Operations – Tom Coolican (Operations Manager), supported by Offshore Installation Managers, Marine Lead (Luke Miocevic) and Operations Admin Support (Niki Ioppolo)</p> <p>Medical &amp; Technical Health Advisor – Leisa Maguire (HSE Lead &amp; RN)</p> <p>Human Resources – Shay Leahy (HR Business Partner)</p> <p>Logistics – David Brown (Supply Chain Manager)</p> <p>Government Policy/ Legal – John Newman (Managing Counsel)</p> <p>Project Admin – Suzanne Cashman (Office Administrator)</p>	<p>Operator response noted.</p> <p>Operator advised that key responsibilities are defined and communicated in a procedure.</p> <p>Operator advised that personnel are operating 7 days and no understudy arrangements.</p>
	<p>2. Do you have a functional emergency response plan describing roles and responsibilities and arrangements for the performance of the team and various support functions?</p>	<p>COVID 19 Project Management Framework</p>	<p>Operator response noted.</p> <p>Operator confirmed there is a COVID specific management plan for all facilities and one for office.</p>
	<p>3. Is an incident action planning process (IAP, or similar) being implemented?</p> <p>If yes:</p> <ul style="list-style-type: none"> <li>• outline objectives and strategies your organisation is implementing to manage COVID19-related preparedness and consequences; and</li> <li>• describe key features of the process for preparing, approving, implementing, monitoring and reviewing IAPs (or similar) manage the</li> <li>• incident.</li> </ul>	<p>No</p>	<p>Operator response noted.</p> <p>Operator advised that Jadestone has developed procedures to allow normal procedures to proceed, so not considering it an incident, so an IAP is not being implemented.</p> <p>Have specific COVID emergency response management plans for each facilities (4 of these).</p> <p>Project team with roles and responsibilities, meeting twice weekly to review process.</p> <p>Framework reflects what would be applied in an incident management process, but built into normal operations rather than separate process.</p>

### Topic 4 – Plans for submission of permissioning documents to NOPSEMA

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The following information aims to inform NOPSEMA of duty-holders’ plans regarding the submission of permissioning documents to allow optimal allocation of resources to support the industry.

Topic summary	Prompt	Operator Response	NOPSEMA Observations
Submission of <u>new</u> permissioning documents in the next 3 months	<p>1. What is your current submission schedule for the next 3 months for new safety case(s)?</p> <p>What is the associated priority for a regulatory acceptance decision for each:</p> <ul style="list-style-type: none"> <li>• High – activity was planned to commence within 3 months</li> <li>• Medium – activity was planned to commence within 12 months</li> <li>• Low – activity was planned to commence beyond 12 months</li> </ul>	Jadestone does not plan to submit any new safety cases in the next 3 months.	Operator response noted.
	<p>2. What is your current submission schedule for the next 3 months for new Well Operations Management Plans (WOMPs)?</p> <p>What is the associated priority for a regulatory acceptance decision for each:</p> <ul style="list-style-type: none"> <li>• High – activity was planned to commence within 3 months</li> <li>• Medium – activity was planned to commence within 12 months</li> <li>• Low – activity was planned to commence beyond 12 months</li> </ul>	Jadestone does not plan to submit any new well operations management plans in the next 3 months. Jadestone will continue to respond to RFFWI for WOMPS currently under assessment.	Operator response noted.
	<p>3. What is your current submission schedule for the next 3 months for new Offshore Project Proposals/Environment Plans?</p> <p>What is the associated priority for a regulatory acceptance decision for each:</p> <ul style="list-style-type: none"> <li>• High – activity was planned to commence within 3 months</li> <li>• Medium – activity was planned to commence within 12 months</li> <li>• Low – activity was planned to commence beyond 12 months</li> </ul>	Jadestone does not plan to submit any new offshore project proposals or environment plans in the next 3 months and will continue to respond to RFFWI for EP currently under assessment.	Operator response noted.
Submission of <u>revised</u> permissioning documents to address measures taken	<p>4. Do you believe revised safety cases will need to be submitted to address measures taken to manage identified consequences of the COVID-19 pandemic?</p>	No	Operator advised Jadestone don’t have incident as COVID is about workforce health, and have incorporated increased controls to ensure maintain health workforce. Augmented controls so don’t believe deviation /new increased impacts or risks that require a revision.

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following COVID-19 pandemic	If so, please provide details of each applicable case.		
	5. Do you believe revised WOMPs will need to be submitted to address measures taken to manage identified consequences of the COVID-19 pandemic?  If so, please provide details of each applicable case.	No	Operator response noted.
	6. Do you believe revised EPs will need to be submitted to address measures taken to manage identified consequences of the COVID-19 pandemic?  If so, please provide details of each applicable case, including: <ul style="list-style-type: none"><li>• The name of the activity,</li><li>• The title, revision number and date of the relevant in force EP,</li><li>• a summary of the nature of the proposed change, and</li><li>• likely EP submission date.</li></ul>	No	Operator response noted.

Other relevant information relating to the company’s COVID-19 response: No further information provided